

Appl. No. 09/944,540
Amdt. dated March 31, 2005
Reply to Office Action of November 2, 2004

PATENT

REMARKS

By this paper, Applicant amends claims 16, 18 and 24. Claims 1-30 remain pending in the application and are presented for reconsideration, further examination, and allowance.

Discussion of Objections to the Specification

The Examiner objected to the Title as not descriptive. Applicant amends the Title to the title suggested by the Examiner. Applicant request withdrawal of the objection to the specification in light of the amendment.

Discussion of Rejections Under 35 USC §102(e)

Claims 1, 5-7, and 15-30 were rejected under 35 USC §102(e) as allegedly anticipated by U.S. Patent No. 6,738,901 to Boyles et al. (hereinafter Boyles). The Examiner contends that Boyles describes every element of the claims. Applicant respectfully traverses the rejection and requests reconsideration and allowance of the claims.

In order for a claim to be anticipated by a reference, the reference describes each and every element as set forth in the claim, either expressly or inherently, in the single prior art reference. Applicant respectfully contends that Boyles fails to disclose at least one claimed element from each of claims 1, 5-7, and 15-30.

Claim 1 recites a memory card comprising "memory that stores a plurality of usernames and passwords each username and password associated with a predetermined network address" and "a controller, coupled to both the memory and [an] input/output device, that controls operation of the memory card, the controller comprising means for controlling access to the usernames, passwords, and associated network addresses through the input/output device in response to a valid request from a first network address for an associated first username and first password."

Boyles fails to describe memory within a memory card that stores a plurality of usernames and passwords each username and password associated with a predetermined network address. Instead, Boyles describes an Internet access card that includes a read-only *memory that stores only a predetermined serial number*. For example, Boyles states: "The personal smart

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card 250 also includes an encoded memory chip 254. The encoded chip is a *read only memory device that stores a unique serial number typically pre-encoded rather than information about the user.*" Boyles at Col. 10 ll. 4-7 (*emphasis added*). When a user initially registers or associates the access card with the individual user, a password and user name can be established that is stored at a *server*, not within the memory card. Boyles states: "At the end of the registration process, that number is read from the card and is *transmitted to the server where it is stored* correlated with the password or PIN number and the data associated with the user." *Id.* at Col. 10 ll. 7-11. (*emphasis added*). Therefore, Boyles does not anticipate claim 1 because Boyles does not describe a memory card that stores a plurality of usernames and passwords. In Boyles, the access card stores a predetermined serial number that can be associated with a single username and password that is stored in a server.

Boyles also fails to disclose a memory card comprising a controller. Boyles, in Figure 4 and the associated text, describes the access card as having an embedded memory chip, a digital photograph of the user, and a name of a user or a name of a school or library. Boyles does not describe a controller in the access card. Indeed, in the background section, Boyles describes how it is disadvantageous to have a microprocessor in an access card. Boyles states: "Even though the GuardiaNet system provided customized internet access, the system was not economical because the cards used in the system were too expensive. More specifically, the cost of each card was approximately \$7.00 because each card included a microprocessor." *Id.* at Col. 2 ll. 12-17. Thus, Boyles is explicitly directed to an access card that does not include a microprocessor. Therefore, Boyles does not anticipate claim 1 at least for this reason, independent of any other distinction.

Claim 16 recites a method that includes "retrieving from memory within the memory card, the username and corresponding password associated with the network address." Because Boyles, as discussed above, fails to include a memory in the access card that has the capability to store usernames and passwords for network addresses, Boyles cannot anticipate a claim that includes retrieving such information from memory within the memory card. As discussed above, Boyles describes an access card having a read only memory that stores a unique serial number, and does not describe any passwords or usernames stored in the access card.

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Therefore, Applicant respectfully requests reconsideration and allowance of claim 16 because Boyles fails to describe all of the elements of the claim.

Claims 18 and 24 include elements similar to that discussed above in relation to claim 16 and are believed to not be anticipated by Boyles for the same reasons as presented for claim 16. Applicant respectfully requests reconsideration and allowance of claims 18 and 24 because Boyles fails to describe all of the elements of the claims.

Claims 5-7, and 17, 19-23, and 25-30 depend, either directly or indirectly from one of claims 1, 16, 18, or 24 and are believed to be allowable at least for the reason that they depend from an allowable base claim. Applicant respectfully requests reconsideration and allowance of claims 5-7, and 17, 19-23, and 25-30.

Discussion of Rejections Under 35 USC §103(a)

Claims 2-4 and 8-14 are rejected under 35 USC §103(a) as allegedly unpatentable over Boyles in combination with one of U.S. Patent No. 6,802,007 to Canelones et al. (hereinafter Canelones), U.S. Patent No. 6,792,422 to Stride et al. (hereinafter Stride), U.S. Patent No. 6,807,532 to Kolls (hereinafter Kolls), or U.S. Patent No. 6,408,389 to Grawrock et al. (hereinafter Grawrock).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be reasonable expectation of success. Finally, the prior art reference, or references when combined, must teach or suggest all of the claim limitations.

Claim 8 recites a memory card that includes "memory that stores a plurality of usernames and a password corresponding with each username, each username and its corresponding password associated with a predetermined universal resource locator of a web site." The memory card also includes "a controller, coupled to both the memory and the bus interface, that controls access to the memory card in response to a valid password." As noted before, Boyles fails to disclose a memory card having a memory that stores usernames and

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corresponding passwords. Also, Boyles fails to disclose a memory card having a controller, and in fact, teaches away from a memory card having a controller. Canelones, Stride, Kolls, and Grawrock do not include the features not described in Boyles. Indeed, Stride, Kolls, and Grawrock do not discuss memory within memory cards and the use of memory cards for storage of passwords and usernames associated with universal resource locators. Thus, Boyles, either alone or in combination with any of Canelones, Stride, Kolls, and Grawrock fails to describe each and every feature of claim 8. Therefore, Applicant respectfully request reconsideration and allowance of claim 8.

Because claim 1 include features similar to those distinguishing claim 8 over the cited references, claim 1 is also believed to be allowable over the combination of Boyles with any of the cited references.

Claims 2-4 and 9-14 depend, either directly or indirectly, from one of claims 1 and 8 and are believed to be allowable at least for the reason that they depend from an allowable base claim. applicant respectfully requests reconsideration and allowance of claims 2-4 and 9-14.

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CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at (858) 845-5235.

Respectfully submitted,



Howard Seo
Reg. No. 43,106

QUALCOMM, Incorporated
Attn: Patent Department
5775 Morehouse Drive
San Diego, California 92121-1714
Tel: (858) 658-5787
Fax: (858) 658-2502